

1 D. GEORGE SWEIGERT, C/O  
2 336 BON AIR CENTER #241  
3 GREENBRAE, CA 94904

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4 IN THE UNITED STATES DISTRICT COURT  
5 FOR THE DISTRICT OF SOUTH CAROLINA

6 D. GEORGE SWEIGERT

7 Plaintiff,

8 vs.

9 JASON GOODMAN

10 Defendant

Case No.: 2:18-cv-01633-RMG-BM

BRIEF IN SUPPORT OF PLAINTIFF'S SHOW  
CAUSE MOTION AS TO WHY THE DEFENDANT  
SHOULD NOT RESTRAINED BY AN INJUNCTION  
TO CEASE AND DESIST DEFENDANT'S  
COPYRIGHT INFRINGEMENT

11 **BRIEF IN SUPPORT OF PLAINTIFF'S SHOW CAUSE MOTION**

12  
13 NOW COMES THE PRO SE plaintiff, a layman non-attorney, to submit this BRIEF to support plaintiff's  
14 MOTION before this Court as to why the defendant should not be restrained with an injunctive order to cease the  
15 copyright infringement of the plaintiff's intellectual property on social media platforms. This MOTION is sought  
16 pursuant to F.R.C.P. Rule 65(b). Restated: the plaintiff requests that this Court deem Jason Goodman, defendant, to  
17 have violated the protected copyright of the plaintiff requiring this Court's injunctive order. This BRIEF supports  
18 the accompanying F.R.C.P. Rule 65(b) MOTION.

19  
20 **FACTS**

21 Defendant Jason Goodman operates at least **three (3)** YouTube social media channels.

- 22 • "JASON GOODMAN" <https://www.youtube.com/channel/UC8Cl9QaRtuW9CNjP7pP4BBQ>
- 23 • "21c3D" <https://www.youtube.com/user/21c3D>
- 24 • "Crowdsource the Truth 2" [https://www.youtube.com/channel/UC6e48gru\\_N9w-tyqMCrI9Qw](https://www.youtube.com/channel/UC6e48gru_N9w-tyqMCrI9Qw)

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28 PLAINTIFF'S BRIEF TO SUPPORT SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD  
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1 The defendant also operates rogue channels that are designed to openly harass, intimidate and injure the  
 2 plaintiff and others like him. As outlined in the accompanying PLAINTIFF'S SECOND REQUEST FOR  
 3 JUDICIAL NOTICE [RJN] the defendant has admitted in a YouTube broadcast that he has knowingly infringed on  
 4 the property interests of the plaintiff by the BULK transfer of dozens and dozens of videos to rogue YouTube  
 5 accounts (created and maintained by Goodman) known as:

- 6
- 7 • **CRAZY DAVE'S INSANE-ATORIUM**
- 8 • **EXPOSING THE CHAVEZ HOAX**
- 9

10 This latest revelation indicates that the defendant Goodman is a racketeer impersonating a journalist; or in  
 11 the alternative, Goodman is a "journalist" that has created two (2) rogue YouTube channels (CRAZY DAVE &  
 12 CHAVEZ HOAX) in violation of the YouTube TERMS OF SERVICE (T/S).

13 This so-called "journalist" has violated the criminal provisions of the federal copyright infringement laws  
 14 related to the commercialized BULK "re-upload" of plaintiff's video property for public rebroadcast, publication  
 15 and distribution without the plaintiff's consent. It is the commercial enterprise Crowdsourcing The Truth that is  
 16 distributing dozens and dozens of videos that are the exclusive intellectual property of the plaintiff and which the  
 17 defendant as NO rights to. This is a criminal copyright infringement.

18 As the Court will learn, defendant Goodman routinely commits reckless acts of criminality on a nearly  
 19 weekly basis. These criminal acts infringe upon innocent third parties that have been personally by Goodman  
 20 selected as social media targets of Crowdsourcing The Truth.

21 **MANUAL CHAVEZ, III AND THE HOAX SITE "EXPOSING THE CHAVEZ HOAX"**

22 Goodman created a hoax YouTube site "Exposing the Chavez Hoax" that contains over eighty (80)  
 23 original YouTube videos which are the exclusive intellectual property of the plaintiff. Although defendant  
 24 Goodman (infringer) has zero right to acquire, distribute, rebroadcast for public viewing and/or publish the  
 25 plaintiff's works, Mr. Goodman has done so in violation of 17 U.S.C. § 506(a), which provides that "[a]ny person  
 26 who infringes a copyright willfully and for purposes of commercial advantage or private financial gain" shall be  
 27 punished as provided in 18 U.S.C. § 2319".

28 PLAINTIFF'S BRIEF TO SUPPORT SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD  
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As displayed in the accompanying Request for Judicial Notice [RJN] (as Artifact One [RJN, Art.1]) the “Exposing the Chavez Hoax” channel is itself a hoax perpetrated by infringer Goodman. The CHAVEZ HOAX channel contains artwork that displays the facial likeness of one Manual Chavez, III. The head of Mr. Chavez appears on the head of a pig (as it is presumed that Mr. Chavez holds religious beliefs concerning consumption of pork).

The “Exposing the Chavez Hoax” channel was personally launched by defendant Goodman as described in the video information tab of Artifact Two [RJN, Art.2]. This video, dated 12/11/2017, carries content that insinuates that Mr. Chavez planted an explosive device at the New York Port Authority in an attempt to assassinate Mr. Goodman (although Mr. Chavez was a resident of Arizona at the time). Quoting the 12/11/2017 video information tab in relevant part:

To more effectively neutralize their efforts, **Crowdsource the Truth** will go back to ignoring them and remain dedicated to investigative journalism, crowdsource fact checking and the serious work we have all set out to do. If you also wish to ignore these individuals, please continue to enjoy that effort here.

Those interested in learning how the misguided, malignant personnel are carrying out their nefarious plans and help put an end to their wrongdoing may do so at a new YouTube channel "**Exposing the Chavez Hoax**" with content coming soon, link below: <https://www.youtube.com/channel/UCE7t...>

[RJN, Art.2][emphasis added]

NOTE: An article about the New York Port Authority bombing appears in at [RJN, Art.3].

It is clear from the foregoing that defendant Goodman (infringer) induced his followers on 12/11/2017 to believe that Manual Chavez, III may have made an attempt on the defendant’s life and/or safety. Therefore, in retaliation for this perceived bombing threat of Mr. Chavez, Mr. Goodman created the YouTube channel “Exposing the Chavez Hoax” and announced same in the information tab of his 12/11/2017 video entitled, “Port Authority Bus Terminal Explosion Deemed 'Botched Terror Attempt' By NYPD” (4,4K+ views) [RJN, Art.2].

In sum, Mr. Goodman took a tragic terrorist event in New York City, increased the public alarm to his audience, and insinuated that Manual Chavez, III may have attempted to attack him. In the same sweep of the hand, Mr. Good created the CHAVEZ HOAX channel (which itself is a Goodman hoax). Then Mr. Goodman re-uploaded eight (80) of the plaintiff’s copyrighted video works to this hoax channel violating the T/S of YouTube, LLC.

PLAINTIFF’S BRIEF TO SUPPORT SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD NOT BE DEEMED TO HAVE RECEIVED CONSTRUCTIVE NOTICE OF PENDING LAWSUIT

1 As of this writing the “Exposing the Chavez Hoax” still contains more than eighty (80) video productions  
2 that are the property of the plaintiff. No rights to distribution or publishing have been granted by the plaintiff to the  
3 defendant. Mr. Goodman and his commercial enterprise Crowdsourc The Truth have zero rights to publish or  
4 publicly rebroadcast the plaintiff’s intellectual property on Goodman’s hoax YouTube site “Exposing the Chavez  
5 Hoax” [RJN, Art.1].

6  
7 **CRAZY DAVE’S INSANE-ATORIUM**

8 Infringer Goodman created another hoax channel called “CRAZY DAVE’S INSANE-ATORIUM”. This  
9 hoax channel contained over eight (80) works that were the exclusive property of the plaintiff. Mr. Goodman  
10 himself confesses to the distribution and publishing of nearly “all” or “huge” numbers of the plaintiff’s works (for  
11 which the infringer Goodman and his commercial enterprise have no right to acquire, distribute, rebroadcast or  
12 publish).

13 The Court’s indulgence is requested as the offending “CRAZY DAVE” channel has recently been  
14 terminated by YouTube for copyright infringement (due to dozens of copyright complaints filed with YouTube by  
15 the undersigned). The CRAZY DAVE channel was another example of a Goodman hoax channel.

16 Fortunately, an artifact filed in related litigation documents the CRAZY DAVE hoax channel (Steele v.  
17 Goodman, U.S.D.C. for the Eastern District of Virginia (E.D.V.)). Notice the artifact known as the “SIXTH  
18 DECLARATION OF D. GEORGE SWEIGERT”, [Doc.59, 6/07/2018] Case: 3:17-cv-00601-MHL [RJN, Art.4].

19 As explained in the SIXTH DECLARATION [RJN, Art.4] (submitted under the penalties of perjury) Mr.  
20 Goodman uploaded original content that he created with his racketeering “researcher” Quinn Micheals (aka Korey  
21 Atkin of Oregon) to this hoax site. Meaning, Mr. Goodman and his “researcher” both created video content that was  
22 uploaded by Goodman to the CRAZY DAVE hoax channel. This indicates that Mr. Goodman had access to this  
23 YouTube channel for the purposes of uploading the defendant’s content as well as the plaintiff’s unauthorized  
24 content.

25 Exhibit One within the DECLARATION [RJN, Art.4] contains a screen-shot of the YouTube video  
26 entitled “The Webb of Lies and the Lying Liars Who Weave Them”, dated 5/09/2018 (833 views on the CRAZY  
27 DAVE channel). This video 5/09/2018 content was created by Mr. Goodman.

28 PLAINTIFF’S BRIEF TO SUPPORT SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD  
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1 One month later the CRAZY DAVE channel would contain over eighty (80) works of the plaintiff  
 2 available to the public in the form of a distributed rebroadcast that infringed upon the plaintiff's intellectual property  
 3 rights.

4 In his videos, Mr. Goodman's non-existent reverence for the federal legal system can be gauged by his  
 5 constant references to the "fake lawsuit" brought against him in the U.S.D.C. for the E.D.V. (Steele v. Goodman).  
 6 "When all know it's a fake lawsuit", page one, line 23 [pg.1.ln.23] within [RJN, Art.4].

7  
 8 **MR. GOODMAN'S CONFESSION**

9 In the video entitled, "\*\*\*This is a Test of the Mobile Skype Broadcasting System\*\* with Special  
 10 Guest Quinn Michaels, dated 7/2/2018 (<https://www.youtube.com/watch?v=XtR0aTqOnhA>) Mr. Goodman  
 11 proclaims at [RJN, Art.5]):

12 28:15 **GOODMAN.** You know Quinn, I posted all of Dave's videos [the undersigned] – or a huge  
 13 number of Dave's videos – uh, just a couple of weeks ago. And Dave had them taken down by  
 14 issuing copyright strikes.

15 50:07 **GOODMAN.** That's why I wanted to re-post those videos that Dave had made. Cause he is  
 16 putting them out there and then deleting them. Because I believe he is using YouTube as a  
 17 communications network.

18 (See artifacts at [RJN, Art.5])

19 **AFFIRMATIVE DEFENSE:** The allegations presented in this video by Mr. Goodman, that the undersigned runs  
 20 some type of covert operative network and uses YouTube videos to encode messages to operatives, have been  
 21 completely disavowed ("debunked") in no less than seven (7) declarations (made under the penalties of perjury) that  
 22 appear in the Steele v. Goodman lawsuit [RJN, Art.4]. These declarations have been served upon defendant  
 23 Goodman by the undersigned as a listed interested party in the U.S.D.C. for the E.D.V. (Steele vs. Goodman)  
 24 lawsuit. Mr. Goodman has knowledge of all of these declarations (in fact the defendant has published YouTube  
 25 videos scrolling through the declarations and discussing them with his world-wide audience). A complete court  
 26 docket of this lawsuit appears at [RJN, Art.6].

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 28 **PLAINTIFF'S BRIEF TO SUPPORT SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD  
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1 Nonetheless, infringer Goodman, clothed in his self-referential and unaffiliated “journalist” role, continues  
2 to publish and distribute video content with the false narrative that the plaintiff is the ring-leader of a deep state  
3 media cell that has as an operational objective to make Mr. Goodman “look foolish”.

4 To the contrary, Mr. Goodman (infringer) intentionally distributes and publishes his “deep state”  
5 allegations as a “journalist” to embarrass, harass and injure the property interest of a good reputation of the  
6 undersigned. Such misconduct and unethical over-the-top behavior is the driving force behind the hundreds (if not  
7 thousands) of individual acts of wire fraud perpetrated by the defendant upon the public, the plaintiff and others like  
8 him. By defrauding the plaintiff of his reputation (denying his property interest) Mr. Goodman’s vast Crowdsorce  
9 The Truth commercial enterprise continues to publicly and privately profit from the infringement of the plaintiff’s  
10 rights.

11 Infringer Goodman’s Crowdsorce The Truth crossed the line when his commercial enterprise “re-  
12 uploaded” – IN BULK -- eighty (80) works of the plaintiff (prior to the commencement of this lawsuit) to the  
13 CRAZY DAVE channel. When YouTube terminated the CRAZY DAVE channel, the defendant “re-uploaded” the  
14 eighty (80) works to the “EXPOSING THE CHAVEZ HOAX” channel – AFTER the defendant had constructive  
15 knowledge of this present lawsuit.

16 These “re-uploading” activities of the plaintiff’s intellectual property in BULK to Goodman’s  
17 commercialized hoax YouTube channels (CRAZY DAVE / EXPOSING THE CHAVEZ HOAX) is a crystal-clear  
18 violation of 17 U.S.C. § 506(a).

19 Quoting the U.S. Attorney’s Manual in relevant part:

20 1847. Criminal Copyright Infringement -- 17 U.S.C. 506(a) And 18 U.S.C. 2319

21  
22 “There are four essential elements to a charge of criminal copyright infringement. In order to sustain a  
23 conviction under section 506(a), the government must demonstrate: (1) that a valid copyright; (2) was  
24 infringed by the defendant; (3) willfully; and (4) for purposes of commercial advantage or private financial  
25 gain. Attempts to infringe are prohibited to the same extent as the completed act. Conspiracies to violate the  
26 Act can be prosecuted under 18 U.S.C. § 371.”

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28 PLAINTIFF’S BRIEF TO SUPPORT SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD  
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1 **GOODMAN'S CONTEMPT FOR THE U.S. COURTS**

2 Mr. Goodman has stated in at least a dozen video productions that the Steele v. Goodman lawsuit in the  
3 U.S.D.C. for the E.D.V. (current docket attached [RJN, Art.6]) "is a fake lawsuit". In fact, Mr. Goodman openly  
4 advocates that plaintiffs who avail themselves of the U.S. Courts should be "jailed, locked-up and key thrown  
5 away".

6 In the YouTube video entitled, "Imran Skates Part 2 – A Travesty of Justice Unfolding in Real Time  
7 #PakistaniMysteryMan", 7/03/2018 (3.8K+ views) Mr. Goodman proclaims [RJN, Art.7].

8  
9 1717: GOODMAN. "Civil suit against me. A second civil suit. Not the Robert David Steele fake lawsuit  
10 this is now a Dave Sweigert fake lawsuit. But, I don't think you can just keep bringing these uh .. totally  
11 frivolous lawsuits against people. Without there being some kind of legal repercussions against the person  
12 doing that."

13 [RJN, Art.7]

14  
15 In a recent video, it is instructive to note Goodman relay a story to his audience about an incident that took  
16 place 7/03/2018 at the U.S.D.C. for the District of Columbia that involved Goodman and his former business partner  
17 (wrong-doer George Webb Sweigert). Apparently, U.S. Marshalls were summoned when Goodman and Webb-  
18 Sweigert began arguing in the U.S. courthouse lobby. The U.S. marshals intervened in the dispute and asked  
19 Goodman / Webb-Sweigert to leave the building. This attitude displayed by the defendant crystalizes his scorn for  
20 the decorum of the U.S. Courts.

21 In another video from 7/03/2018, Goodman can be seen blocking the U.S. federal courthouse in the District  
22 of Columbia underground parking EXIT. U.S. Marshals were required to instruct Mr. Goodman to leave the EXIT  
23 ramp area for the underground parking garage. U.S. Marshals personally accompanied Goodman away from the  
24 EXIT ramp. In a hostile exchange, Goodman is seen arguing with U.S. Marshals and questioning their security  
25 methods at the Pre-Trail Services entrance to the U.S. courthouse.

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28 PLAINTIFF'S BRIEF TO SUPPORT SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD  
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It is noteworthy that in the video thumbnail for Goodman's "journalist" "work" entitled "'Imran Skates Part 2 – A Travesty of Justice Unfolding in Real Time #PakistaniMysteryMan" [RJN, Art.7] contains the likeness of a criminal defense counsel that has become another target of Goodman (Chris Gowen, esq. of the District of Columbia Bar). Mr. Gowen is depicted as a male ice skater (with Gowen's facial likeness) and Mr. Gowen's male client appears as a female ice skater (with client's facial likeness) lifted into the air by her male partner (Gowen) in a lewd pose. Again, this speaks to Mr. Goodman's utter contempt for anyone associated with the U.S. Courts.

### **TERMS OF SERVICE VIOLATIONS**

It has been by his own mouth that the infringer defendant admitted to his world-wide audience that he traffics in BULK transfers and distribution of video properties that he has no right to in violation of the YouTube TERMS OF SERVICE (T/S) [RJN, Art.8]. Quoting the YouTube T/S in relevant part:

#### **6. Your Content and Conduct**

A. N/A

B. You shall be solely responsible for your own Content and the consequences of submitting and publishing your Content on the Service. **You affirm, represent, and warrant that you own or have the necessary licenses, rights, consents, and permissions to publish Content you submit;** and you license to YouTube all patent, trademark, trade secret, copyright or other proprietary rights in and to such Content for publication on the Service pursuant to these Terms of Service.

C. N/A

D. You further agree that Content you submit to the Service **will not contain third party copyrighted material, or material that is subject to other third party proprietary rights**, unless you have permission from the rightful owner of the material or you are otherwise legally entitled to post the material and to grant YouTube all of the license rights granted herein.

E. You further agree that you will not submit to the Service any Content or other material that is contrary to the YouTube Community Guidelines, currently found at [https://www.youtube.com/t/community\\_guidelines](https://www.youtube.com/t/community_guidelines), which may be updated from time to time, or contrary to applicable local, national, and international laws and regulations.

Infringer Goodman's conduct does not merely impact one or two videos. To the contrary, Mr. Goodman is fond of re-uploading dozens and dozens of videos which contain content that he has zero legal right to possess as no permission to distribute, publish, or rebroadcast for public showing to further his commercial enterprise. Even after obtaining knowledge of a second lawsuit against him, Mr. Goodman proceeds forward in his copyright infringement activities in reckless disregard with the above cited YouTube, LLC T/S; which Goodman violated by the "re-uploading" of the plaintiff's copyrighted content to the "Exposing the Chavez Hoax".

PLAINTIFF'S BRIEF TO SUPPORT SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD NOT BE DEEMED TO HAVE RECEIVED CONSTRUCTIVE NOTICE OF PENDING LAWSUIT



1 This continued misconduct by Mr. Goodman places YouTube, LLC and GOOGLE, LLC in peril of becoming  
2 embroiled in acrimonious litigation that orbits around infringer Goodman's racketeering and wire fraud.

3 **LEGAL REVIEW**

4 F.R.C.P. Rule 65(b) authorizes this Court to restrain the defendant Goodman from any further collection,  
5 storage, possession, transfer, publication, distribution or exchanging of the intellectual property of the plaintiff (as in  
6 video works). The scope of the proposed temporary restraining order (TRO) is limited to the criminal infringement  
7 of federal copyright laws by Goodman's commercial enterprise – CrowdSource The Truth.

8 The Court should consider the need for such an injunctive order to provide defendant Goodman with  
9 acceptable boundaries for his so-called "journalism". Activities considered out-of-bounds for the defendant should  
10 include the illegal distribution and publication of the plaintiff's intellectual property.

11  
12 **IRREPARABLE HARM**

13 Infringer Goodman is fond of instructing his audience members to look for clues of the encoding of secret  
14 messages in the plaintiff's video works. Mr. Goodman has created arrangements of the intellectual property of the  
15 plaintiff to further a conspiracy theory at the plaintiff's expense. Mr. Goodman continues to incite his audience  
16 members concerning "deep state operatives" that have launched "fake lawsuits", etc. Sooner or later some unhinged  
17 Goodman-follower will take matters into their own hands and launch more reputation destruction attacks.  
18 Goodman's associate Quinn Michaels (aka Corey Atkin) has informed his audience that the plaintiff is "worse than  
19 Hitler" and was involved in "an assassination plot" against him, as an inducement to his followers to take action.

20 Infringer Goodman can state no meritorious argument that would justify his possession, distribution,  
21 publication and public rebroadcast of the plaintiff's works. What the Court does know is that the defendant's  
22 infringing misconduct creates a state of danger and the possibility of irreparable harm for the plaintiff.

23 "An irreparable harm is one that cannot be redressed by a legal or equitable remedy following trial."  
24 *Optinrealbig.com, LLC v. Ironport Sys.*, 323 F.Supp.2d 1037, 1050 (N.D.Cal.2004). *Iconix, Inc. v. Tokuda*, 457 F.  
25 Supp. 2d 969, 974–75 (N.D. Cal. 2006).

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28 PLAINTIFF'S BRIEF TO SUPPORT SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD  
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**SERIOUS QUESTIONS OF LAW**

When the infringer “re-uploaded” eighty (80) works of the plaintiff to the CRAZY DAVE channel [RJN, Art.4] and then (AFTER the defendant was noticed of this lawsuit) “re-uploaded” eighty (80) works of the plaintiff to the “Exposing the Chavez Hoax” channel [RJN, Art.1] Goodman violated the criminal prohibitions of federal copyright infringement laws.

This Court can address this serious misconduct and clear up any ambiguous or vague notions infringer Goodman may have about federal copyright law. Goodman’s commercial enterprise – Crowdsorce The Truth – profits handsomely by the defrauding of the plaintiff’s character and property interest in a good reputation.

Defendant infringer Goodman defrauds his audience when he posits the need to “crowdsorce” the public rebroadcast and distribution of the plaintiff’s intellectual property to support efforts of finding the solution to a secret code words encoded into video content circa “DRINK YOUR OVALTINE” codes used by Radio Orphan Annie decoders in the 1930’s wireless broadcast. Suffice to say that Goodman is commercially exploiting his gullible audience to buy Goodman Ovaltine (easily arranged through PayPal and Patreon third party credit card processors.

It is time for infringer Goodman to justify and explain his encoder theories concerning “deep state operatives” and coded messages and other such conspiracy theorist junk science and hoax news that include the plaintiff. Goodman should be compelled to give a full account of his “re-uploading” activities as they smack of criminal violations of the copyright infringement laws of the United States.

Goodman has violated the plaintiff’s copyrights, Goodman has violated the YouTube T/S, Goodman has admitted to exceeding the YouTube T/S when he engaged in this “re-uploading” for the commercial benefit of Crowdsorce The Truth. Violating the YouTube T/S with a computer to perpetrate a fraud is violation of the Computer Fraud and Abuse Act, 18 U.S.C. § 1030 (see similar violations by Goodman of the web-site VesselTracker.Com on 6/14/2017 for Goodman’s Charleston Dirty Bomb Hoax show.

The very act of “re-uploading” in BULK by a commercial enterprise to support Mr. Goodman’s fake news, hoax assassination plots and “deep state” operative theories is a violation of federal racketeering laws and is a predicate of wire fraud as defined by 18 U.S.C. § 1962-1965.

Goodman’s commercialized infringements of copyrights should not be tolerated.

PLAINTIFF’S BRIEF TO SUPPORT SHOW CAUSE MOTION AS TO WHY THE DEFENDANT SHOULD NOT BE DEEMED TO HAVE RECEIVED CONSTRUCTIVE NOTICE OF PENDING LAWSUIT

1 “Under the sliding scale theory, a party seeking an injunction “need not demonstrate that he will succeed on  
2 the merits, but must at least show that his cause presents serious questions of law worthy of litigation.” Topanga  
3 Press, Inc. v. City of Los Angeles, 989 F.2d 1524, 1528 (9th Cir.1993).

4 **PRAYER**

5 The plaintiff prays that this Court ORDER the defendant to (1) immediately halt, cease and terminate any  
6 distribution, publication, rebroadcast for public viewing or any unauthorized copyright infringement activity related  
7 to the plaintiff’s intellectual property, (2) to includes any works or intellectual property related to artifacts created by  
8 the plaintiff.

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11 Dated this day of July 5, 2018

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D. GEORGE SWEIGERT

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